

**Raton Gas Transmission
Pipeline Integrity Management Program**

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SUMMARY

Raton Gas Transmission, Inc. (RGT) is a small, family owned pipeline that has operated out of Raton, New Mexico for forty-five (45) years. Running between the rural mountains of northern New Mexico and the rugged south eastern region of Colorado in a category 1 location, the 23.55 miles of pipeline stretches across areas with extremely low population density and operates under 30% SMYS.

The line diameter is 8.625 inches and the entirety of the pipeline was installed in 1963. No additional pipeline has since been installed. The RGT pipeline is operated and maintained under the United States Federal Energy Regulatory Commission (FERC), the Department of Transportation (DOT), the Pipeline and Hazardous Materials Safety Administration (PHMSA) and the Office of Pipeline Safety (OPS) regulations.

Raton Gas Transmission, Inc., operator ID 17090, is providing the following Gas Transmission Pipeline Integrity Management Program (IMP) in accordance with Title 49 CFR 195.452 of the Federal Pipeline Safety Regulations and Title 18, set out by the State of New Mexico. The Raton Gas Transmission Integrity Management Program (RGTIMP) intends to comprehensively define, manage and execute integrity management, as set out under Title 49 CFR 195.452 and in accordance with its Operations and Maintenance Manual in order to:

- Evaluate the pipeline to determine whether any identified sites or High Consequence Areas (HCA's) exist.
- Provide a process to periodically evaluate its pipeline to determine if new HCA's have been created.
- Ensure the utilization of appropriately trained and qualified company personnel for pipeline integrity assurance.
- Submit semi-annual "performance measure" reports in accordance with 192.945(a) indicating no HCA's on its system.

Raton Gas Transmission, Inc. has a strong interest in the safety and assurance of the public, its customers, as well as its employees and contractors.

Key terms used in RGT's IMP are defined by §192.903 under the rule, unless specifically noted.

INITIAL HCA DETERMINATION EFFORT

I. Method of HCA Identification

1. RGT used Method 1 as defined by Section 192.903 of the Rule. Method 1 Subpart (iv) was used to perform the initial evaluation of the pipeline for a High Consequence Area. This involved the use of the potential impact radius calculation (as shown below) combined with physical inspection. This review was performed during the week of August 23, 2004 by the Vice President accompanied by one Senior Technician.

II. Definition of Identified Site

1. An outside area or open structure occupied by 20 or more persons on at least 50 days in any twelve month period.
2. A building that is occupied by at least 20 persons on at least five days per week for ten weeks out of any twelve month period.
3. A facility occupied by persons who are confined, are of impaired mobility, or who would be difficult to evacuate.

III. PIR Determination

1. RGT determined the applicable Potential Impact Radius for its transmission line using the cited in Section 192.903 Subpart 2 (c) of the Rule.

2. The following is the computation of the PIR:

$$r=0.69*(\text{square root of } (p*d \text{ sq}))$$

Where r is the circular radius in feet surrounding the point of failure, p is the MAOP and d is the diameter of the pipe in inches.

Therefore, RGT has an r equivalent to the following:

$$r=0.69*(\text{sq rt } (450*8.625\text{sq}))$$

The PIR for the RGT transmission line is 126.25 ft.

The original assessment was made using a conservative PIR of 100 meters.

IV. HCA Determination

1. The transmission pipeline was physically walked down by the Vice President accompanied by one Senior Technician using the Patrolling Form 11000 found in Procedure 30, "Patrolling" of the RGT O&M Manual. The forms were used to identify any structures, facilities, or other sites that were within the PIR and that met the definition of identified sites. Due to the size of the PIR and the remote nature of the line, a 20-house count inside the Potential Impact Circle (PIC) is impractical.

2. The physical walk down of the line revealed NO identified sites within the PIC.
3. The following local officials were contacted as part of this effort: The General Manager of Trinidad Natural Gas and The City Manager of Raton. No identified sites were recognized through these contacts.

ONGOING EFFORT TO IDENTIFY HCA's

RGT will, on an annual basis, review its transmission pipeline for HCA identification. This effort will consist of physical walk down of the pipeline. Due to the relatively short length of the PIR, visual examination by the Pipeline Maintenance Crew will be sufficient for the location of any newly identified sites. The following activities will be performed during the walk down:

1. Maintenance Crew walks the pipeline while using Patrolling Form 11000 found in Procedure 30 of the O&M Manual
2. In the event it is determined that an identified site is within the PIR of the pipeline, which in RGT's case is 100m, a description of the facility will be recorded on the form.
3. Contact will be made with a responsible party associated with the identified site to determine the occupancy numbers for the site and frequency of occupation. In the event the site is an outdoor area, like an open campground, with no identified responsible party, local officials will be contacted to assist in determining occupancy.
4. In the event it is unclear whether an identified site is within the PIR of the pipeline, a more precise method of measure, e.g., surveyors will be used to determine the distance from the line.
5. If no identified sites are located during the walk down, the maintenance crew will record the fact that none have been identified on the form.
6. The form will be signed and dated to indicate the date of completion of the walk down.

7. Any potential identified sites will be noted immediately to the President at the conclusion of the walk down.
8. If any HCA segments are identified by the walk down a full Integrity Management Plan will be developed consistent with the Rule.

ENHANCED PROTECTION AGAINST THIRD PARTY DAMAGE

It is noted in the FAQ's for the IM Rule that enhanced protection against third party damage must be implemented in accordance with Section 192.935(d) for an operator with no HCA's, but with transmission pipelines operating below 30 percent of SMYS in class 3 or 4 locations. While RGT's transmission pipeline operates below 30% of SMYS, it has no class 3 or 4 locations along its pipeline. In the unlikely event that a class 3 or 4 location is identified on the pipeline, appropriate actions will be taken to effect the enhanced protection required by the Rule.

PERFORMANCE MEASURES

PHMSA requires reporting of the four overall performance measures identified in ASME B31.8S on a semi-annual basis. The measures are to be taken through June 30th and December 31st of each year and reported to PHMSA two months after each performance period. With no HCA's, RGT is only required to enter that information on the performance data form found electronically on the IM Website at the Integrity Management Database Web site at:

<http://primis.phmsa.dot.gov/gasimp/PerformanceMeasures.htm> /.

ACTIONS IN THE EVENT AN HCA SEGMENT IS IDENTIFIED

Since RGT has no HCA's, no other aspects of the Integrity Management Rule apply at the current time. In the event an HCA segment is identified on the RGT transmission pipeline in the future, a comprehensive Integrity Management Plan will be developed that includes the remaining elements of the Rule. In addition, PHMSA will be notified of the fact that the HCA has been identified in accordance with Section 192.905 Subpart (c) of the Rule.